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The following comments are submitted on behalf of the Conservation Congress:

The title of CEQ's guide infers there *is* a complementary process between EMS and NEPA. We do *not* believe such a process exists.

The intent of ISO 14001 appears to be to do away with science, law, and the public process and create a sharply tilted playing field that hands almost complete dominance of the public landscape over to corporations or corporate agencies such as the U.S. Forest Service.

ISO 14001 is vacuous corporate drivel that has already burrowed its way into Canadian forest management, which happens to be the equivalent of corporate forest management, in a deliberate strategy to fend off science and public involvement in public lands management. A testament to its conservative roots and corporate friendliness is its creep now into the Forest Service and NFMA planning regulations in the U.S.

The Table on pages 7-15 titled "Complementary Elements of the Environmental Management System and National Environmental Policy Act Processes" appears to be an exercise in creative writing that attempts to fit a square peg into a round hole. EMS is not and will not ever be complementary to NEPA. It is an attempt to neutralize NEPA.

It is discouraging that the CEQ has become yet another political pawn in the current Administration and is pushing this 'complementary' idiocy, when it was once a credible entity in which to be proud.

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